

FILED
CLERK, U.S. DISTRICT COURT
Oct. 15, 2015
CENTRAL DISTRICT OF CALIFORNIA
BY: <u>CF</u> DEPUTY

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 5 Los Angeles, California 90017-5524
 Telephone: (213) 629-9040
 6 Facsimile: (213) 629-9022
 7 Attorneys for Plaintiff NICOLE, INC.

8
 9 **UNITED STATES DISTRICT COURT**
 10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12 NICOLE, INC.,
 13 Plaintiff,
 14 v.
 15 OURZ FASHION, INC., a New York
 corporation; and DOES 1 through 10,
 16 inclusive,
 17 Defendants.

Case No. 15-cv-02955-SVW-AJW
~~PROPOSED~~ **PERMANENT**
INJUNCTION
 The Honorable Stephen V. Wilson
 Action Filed: April 21, 2015
 Trial Date: October 27, 2015

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PERMANENT INJUNCTION

Defendant Ourz Fashion, Inc., and its officers, directors, agents, representatives, successors or assigns, and all persons acting in concert or in participation with any of them, including but not limited to Anita Sun, are hereby immediately enjoined from:

1. manufacturing, distributing or selling in any territory, handbags or any related goods or services that contain Nicole Lee’s copyrights, including those reflected in the following copyright registrations, true and correct copies of which are attached hereto as Exhibit A:

<u>Registration</u>	<u>Common Name</u>
Copyright VA 1-879-239	Bicycle Design
Copyright VA 1-879-224	Marina Design
Copyright VA 1-879-483	City Look Design
Copyright VA 1-845-595	Dolly Design
Copyright VA 1-815-902	Clock Tower Design
	Telephone Booth Design
Copyright VA 1-892-243	Shopping Girl Design
Copyright VA 1-879-233	Sandra Design
Copyright VA 1-879-567	Pyramid Lock
Copyright VA 1-870-054	Lion Design I
Copyright VA 1-870-131	Lion Design II
Copyright VA 1-928-281	Cartoon Lining

2. manufacturing, distributing or selling in any territory, handbags or any related goods or services that contain a combination of:

- a. an artistic depiction of a stylish woman; and
- b. two or more of the other following elements associated with Nicole Lee:
 - i. A foreign cityscape or leopard print background;

- 1 ii. A rectangular nameplate with rounded ends and the brand
- 2 name written in red (which may be placed on leather
- 3 background);
- 4 iii. A pyramid-shaped lock with the brand name in red;
- 5 iv. Leather trim with studs;
- 6 v. Faux animal print around zippers, on trim, on buckles, or
- 7 as adornment;
- 8 vi. A circular logo, consisting of an outer and inner circle,
- 9 with initials and/or the brand name (which may be printed
- 10 on the handbag and/or displayed on a vellum hang tag);
- 11 vii. Beige lining with small graphics and brand name in the
- 12 following design: line drawings of objects, dessert food
- 13 items, coffee drinks, handbags and other accessories;
- 14 interspersed with the brand name in various fonts; and
- 15 with the images and name highlighted intermittently with
- 16 red and blue accents; and
- 17 viii. The face of a lion.

18 2. making or displaying any statement or representation that is likely to
19 lead the public or the trade to believe that Defendant’s goods and services are in any
20 manner associated or affiliated with or approved, endorsed, licensed, sponsored,
21 authorized or franchised by or are otherwise connected with Nicole Lee;

22 3. manufacturing, distributing, or selling in any territory, any of the
23 handbags depicted in Exhibit B hereto;

24 4. manufacturing, distributing, or selling in any territory, any of the
25 handbags or other merchandise listed in the Schedule attached as Exhibit C hereto;

26 5. aiding, assisting or abetting any other party in doing any act prohibited
27 by sub-paragraphs (1) through (4) above; and

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6. to the extent they are within Defendant's possession, custody, or control, Defendant shall make available for pick up by Nicole Lee all copies of each of the handbags depicted in Exhibit C;

The Permanent Injunction shall be effective without the posting of any bond or undertaking by Plaintiff Nicole, Inc.

IT IS SO ORDERED.



Dated: October 15, 2015

The Honorable Stephen V. Wilson
Judge, United States District Court

Submitted by:
CALDWELL LESLIE & PROCTOR, PC

Bv /s/ Robyn C. Crowther
ROBYN C. CROWTHER
Attorneys for Plaintiff NICOLE, INC.

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-879-239

Effective date of registration:
September 13, 2013

Title

Title of Work: Background print of a woman with shopping bags and bicycle with faux leather trim and details for handbags, garments, and accessories.

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: July 1, 2013

Nation of 1st Publication: United States

Author

■ **Author:** NICOLE LEE

Author Created: 2-D artwork, applied to handbags and carry-on luggage

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: NICOLE LEE

1133 SOUTH BOYLE AVENUE, LOS ANGELES, CA, 90023, United States

Rights and Permissions

Organization Name: NICOLE LEE

Email: min.l@nicoleleeusa.com

Telephone: 323-264-0005

Address: 1133 SOUTH BOYLE AVENUE

LOS ANGELES, CA 90023 United States

Certification

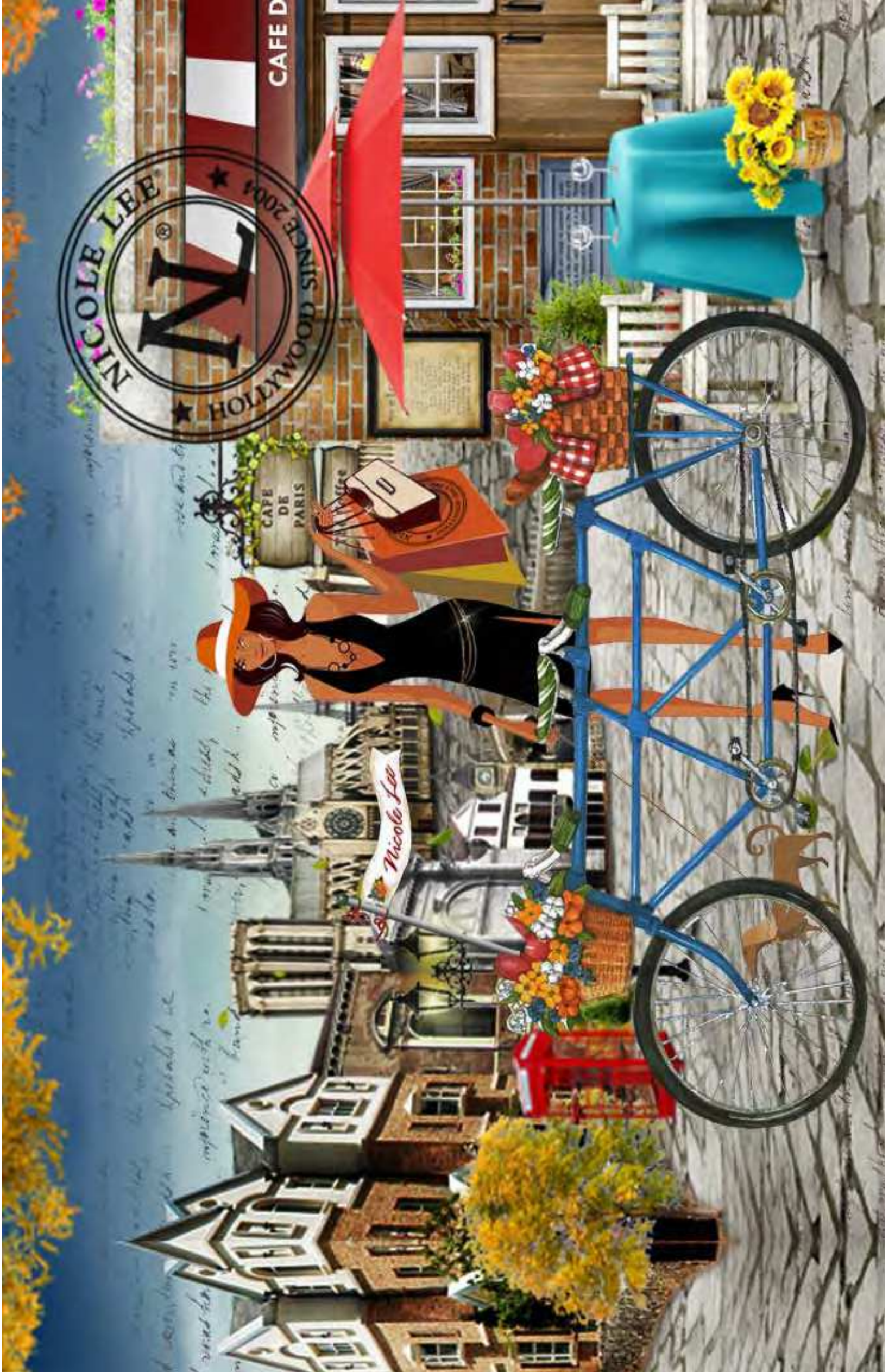
Name: MIN LEE

Date: September 13, 2013

Registration #: VA0001879239
Service Request #: 1-993578622



NICOLE LEE
1133 SOUTH BOYLE AVENUE
LOS ANGELES, CA 90023 United States



Certificate of Registration

RECEIVED NOV 08 P.M.



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number VA 1-879-224

Effective date of registration: September 30, 2013

Title

Title of Work: Flowery design with script handwriting background and model in the center for handbags, garments, and accessories.

Completion/Publication

Year of Completion: 2013
Date of 1st Publication: August 30, 2013
Nation of 1st Publication: United States

Author

Author: NICOLE LEE
Author Created: 2-D artwork, applied to handbags and carry-on luggage
Work made for hire: Yes
Citizen of: United States
Domiciled in: United States

Copyright claimant

Copyright Claimant: NICOLE LEE
1133 SOUTH BOYLE AVENUE, LOS ANGELES, CA, 90023, United States

Rights and Permissions

Organization Name: NICOLE LEE
Email: min.l@nicoleleeusa.com Telephone: 323-264-0005
Address: 1133 SOUTH BOYLE AVENUE
LOS ANGELES, CA 90023 United States

Certification

Name: MIN LEE
Date: September 30, 2013

Registration #: VA0001879224
Service Request #: 1-1001627938



NICOLE LEE
1133 SOUTH BOYLE AVENUE
LOS ANGELES, CA 90023 United States

Certificate of Registration

RECEIVED NOV 12 P.M.



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-879-483

Effective date of
registration:
September 13, 2013

Title

Title of Work: Color-block design with collage print of a city background, gold stud, and faux leather croc details for handbags, garments, and accessories.

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: July 1, 2013

Nation of 1st Publication: United States

Author

Author: NICOLE LEE

Author Created: 2-D artwork, applied to handbags and carry-on luggage

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: NICOLE LEE

1133 SOUTH BOYLE AVENUE, LOS ANGELES, CA, 90023, United States

Rights and Permissions

Organization Name: NICOLE LEE

Email: min.l@nicoleleeusa.com

Telephone: 323-264-0005

Address: 1133 SOUTH BOYLE AVENUE

LOS ANGELES, CA 90023 United States

Certification

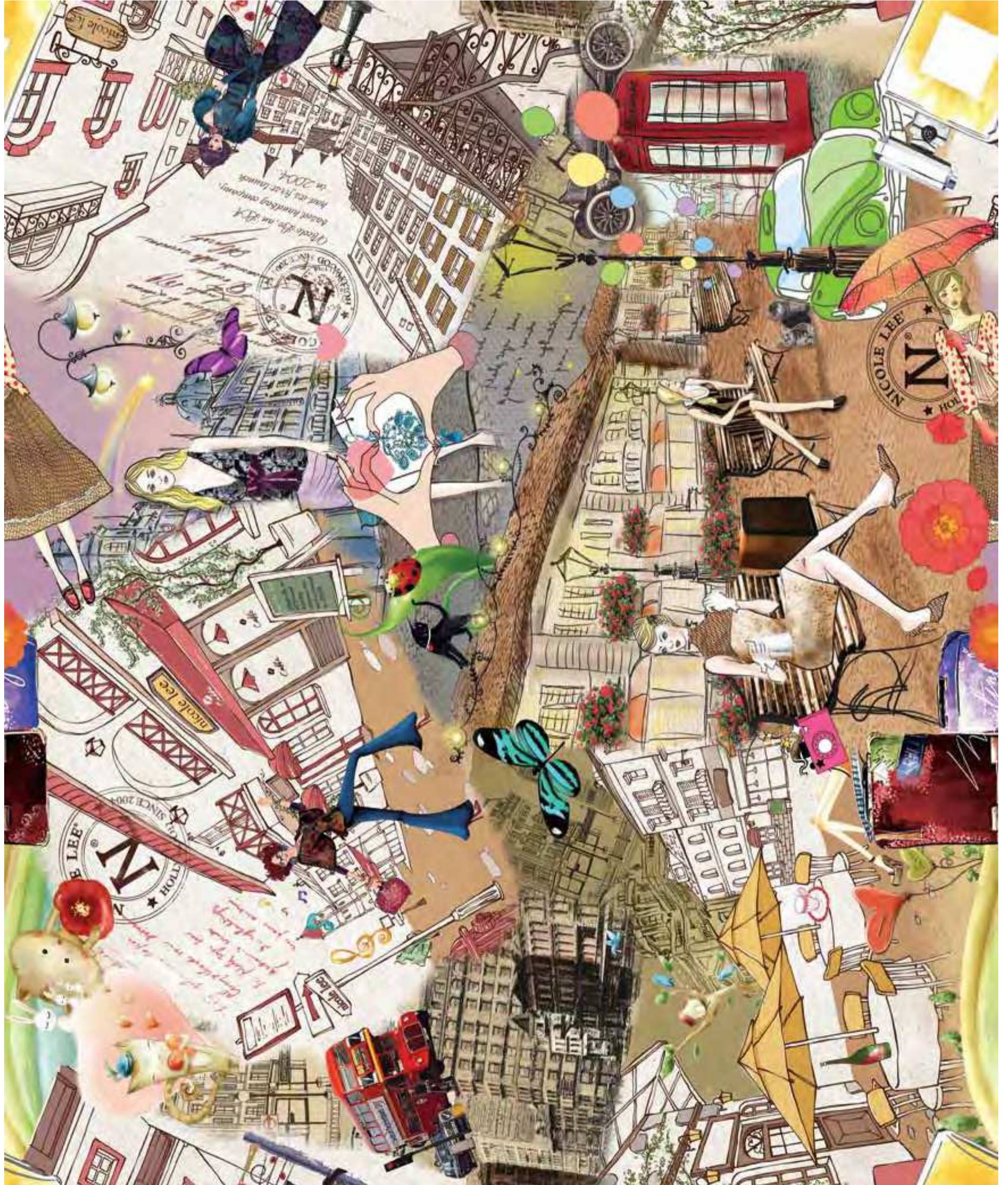
Name: MIN LEE

Date: September 13, 2013

Registration #: VA0001879483
Service Request #: 1-993578397

0000VA00018794830101

NICOLE LEE
1133 SOUTH BOYLE AVENUE
LOS ANGELES, CA 90023 United States



Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-845-595

Effective date of
registration:

January 15, 2013

Title

Title of Work: A woman in a cowboy hat posing in front of a brick wall that's decorated in writing and images of a flag and pin printed on handbags and carry-on luggage.

Contents Titles: A woman in a cowboy hat posing in front of a brick wall that's decorated in writing and images of a flag and pin printed on handbags and carry-on luggage;
Woman's backside in denim is the focal point in backdrop of faded writing accented with flowers, music notes, and flag printed on handbags and carry-on luggage;

A woman is front and center in front of a backdrop of a colorful city skyline with flowers printed on handbags and carry-on luggage;

A chic woman is in front and center of a backdrop of faded writing and a skyline in a vintage tone. Flowers and hearts throughout and leopard print trimming printed on handbags and carry-on luggage;

Pale backdrop with faded writing with doodling throughout. A woman's face is front and center within a seal printed on handbags and carry-on luggage;

Pale backdrop with faded writing with doodling throughout. A woman's face is front and center within a seal printed on handbags and carry-on luggage;

A woman with urban style stands in front of a faded backdrop of a skyline with writing that gives off a vintage feel printed on handbags and carry-on luggage. The image is encased in bright leopard trim

Completion/Publication

Year of Completion: 2012

Date of 1st Publication: January 9, 2013

Nation of 1st Publication: United States

Author

Author: NICOLE LEE

Author Created: 2-D artwork, applied on handbags and carry-on luggage

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: NICOLE LEE

1133 SOUTH BOYLE AVENUE, LOS ANGELES, CA, 90023, United States

Registration #: VA0001845595
Service Request #: 1-877424681



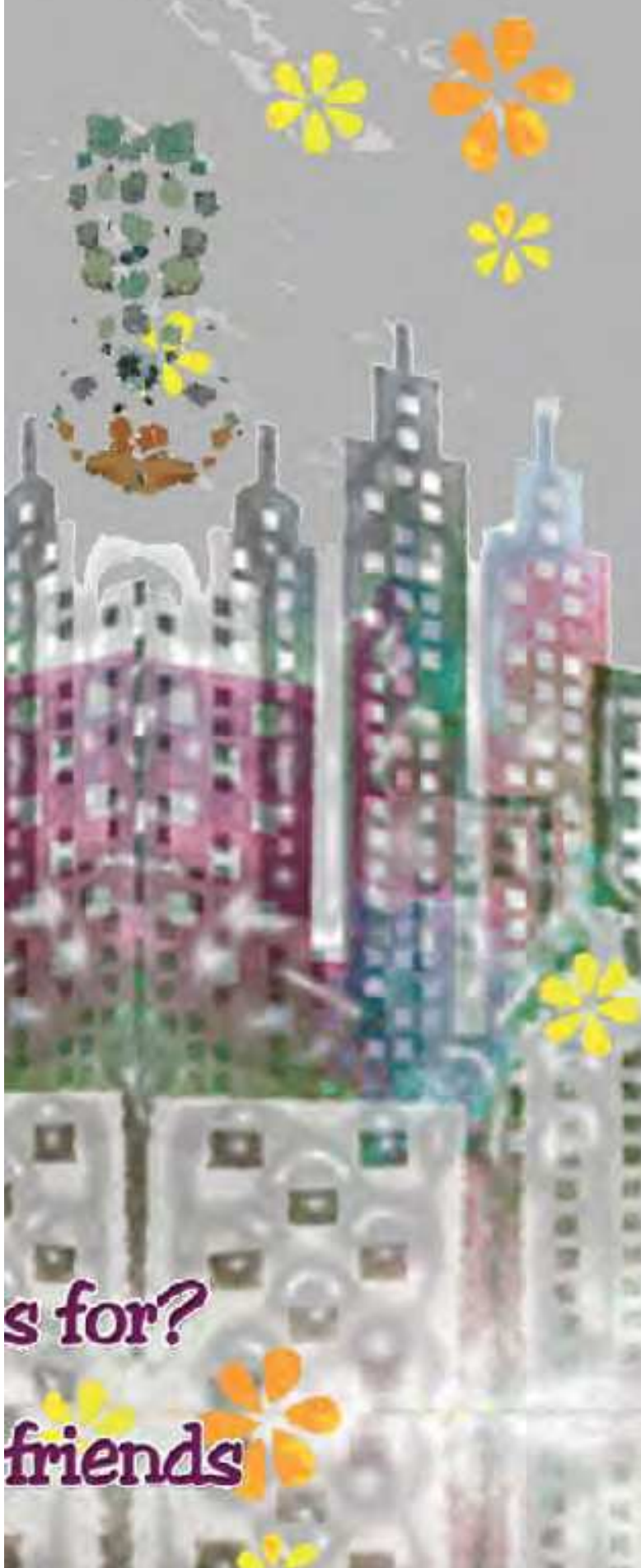
NICOLE LEE
1133 SOUTH BOYLE AVENUE
LOS ANGELES, CA 90023 United States

Do you have any friends in this town?

be accompanied by a friend



Fashion of
City



s for?
friends

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Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-815-902

Effective date of
registration:
May 23, 2012

Title

Title of Work: Print of scenario in a European backdrop with stone paved walkways, architectural buildings and fashionable females walking past with dogs, and a framing floral border for handbags, garments and accessories.

Completion/Publication

Year of Completion: 2012

Date of 1st Publication: May 17, 2012

Nation of 1st Publication: United States

Author

▪ **Author:** Nicole, Inc., DBA Nicole Lee

Author Created: 2-D artwork, applied to handbags.

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: Nicole, Inc., DBA Nicole Lee

1133 S Boyle Ave, Los Angeles, CA, 90023, United States

Rights and Permissions

Organization Name: Nicole, Inc., dba Nicole Lee

Name: SANG LEE

Email: min.l@nicoleleusa.com

Telephone: 323-264-0005

Address: 1133 S Boyle Ave

LOS ANGELES, CA 90023 United States

Certification

Name: Sang Lee

Date: May 23, 2012

-APPLICATION-

Title

Title of Work: Print of scenario in a European backdrop with stone paved walkways, architectural buildings and fashionable females walking past with dogs, and a framing floral border for handbags, garments and accessories.

Print of scenario in a European backdrop with stone paved walkways, architectural buildings, a phone booth, and a single female holding an umbrella in the center among kittens framed with scalloped borders. for handbags, garments and accessories.

Completion/Publication

Year of Completion: 2012

Date of 1st Publication: May 17, 2012

Nation of 1st Publication: United States

Author

▪ **Author:** Nicole, Inc., DBA Nicole Lee

Author Created: 2-D artwork, applied to handbags.

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: Nicole, Inc., DBA Nicole Lee

1133 S Boyle Ave, Los Angeles, CA, 90023, United States

Rights and Permissions

Organization Name: Nicole, Inc., dba Nicole Lee

Name: SANG LEE

Email: min.l@nicoleleeusa.com

Telephone: 323-264-0005

Address: 1133 S Boyle Ave

LOS ANGELES, CA 90023 United States

Certification





Type of Work: Visual Material

Registration Number / Date:
VA0001892243 / 2013-12-09

Application Title: Woman wearing "HAT" (?) with Nicole Lee logo shopping bags
in front of La Tour Eiffel and New York buildings with
silver and golden squared spikes as windows in the
background. for handbags, garments, and accessories.

Title: Woman wearing "HAT" (?) with Nicole Lee logo shopping bags
in front of La Tour Eiffel and New York buildings with
silver and golden squared spikes as windows in the
background. for handbags, garments, and accessories.

Description: Electronic file (eService)

Copyright Claimant:
Nicole Lee.

Date of Creation: 2013

Date of Publication:
2013-11-01

Nation of First Publication:
United States

Authorship on Application:
Nicole Lee, employer for hire; Domicile: United States;
Citizenship: United States. Authorship: 2-D artwork,
Applied to handbags and carry-on luggage.

Rights and Permissions:
Nicole Lee, 1133 South Boyle Avenue, Los Angeles, CA,
90023, United States, (323) 264-0005,
min.1@nicoleleeusa.com

Names: Nicole Lee

=====

-APPLICATION-

Title

Title of Work: Woman wearing "HAT"(?) with Nicole Lee logo shopping bags in front of La Tour Eiffel and New York buildings with silver and golden squared spikes as windows in the background. for handbags, garments, and accessories.

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: November 1, 2013

Nation of 1st Publication: United States

Author

▪ **Author:** Nicole Lee

Author Created: 2-D artwork, Applied to handbags and carry-on luggage

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: Nicole Lee

1133 South Boyle Avenue, Los Angeles, CA, 90023, United States

Rights and Permissions

Organization Name: Nicole Lee

Email: min.l@nicoleleeusa.com

Telephone: 323-264-0005

Address: 1133 South Boyle Avenue

Los Angeles, CA 90023 United States

Certification

Name: Min Lee

Date: December 9, 2013

Registration #:

Service Request #: 1-1062400955

Priority: Routine

Application Date: December 9, 2013 07:06:00 PM

Note to C.O.: Nicole Lee is a company located in Los Angeles, California

Correspondent

Organization Name: Nicole Lee

Name: Min Lee

Email: min.l@nicoleleeusa.com

Telephone: 323-264-0005

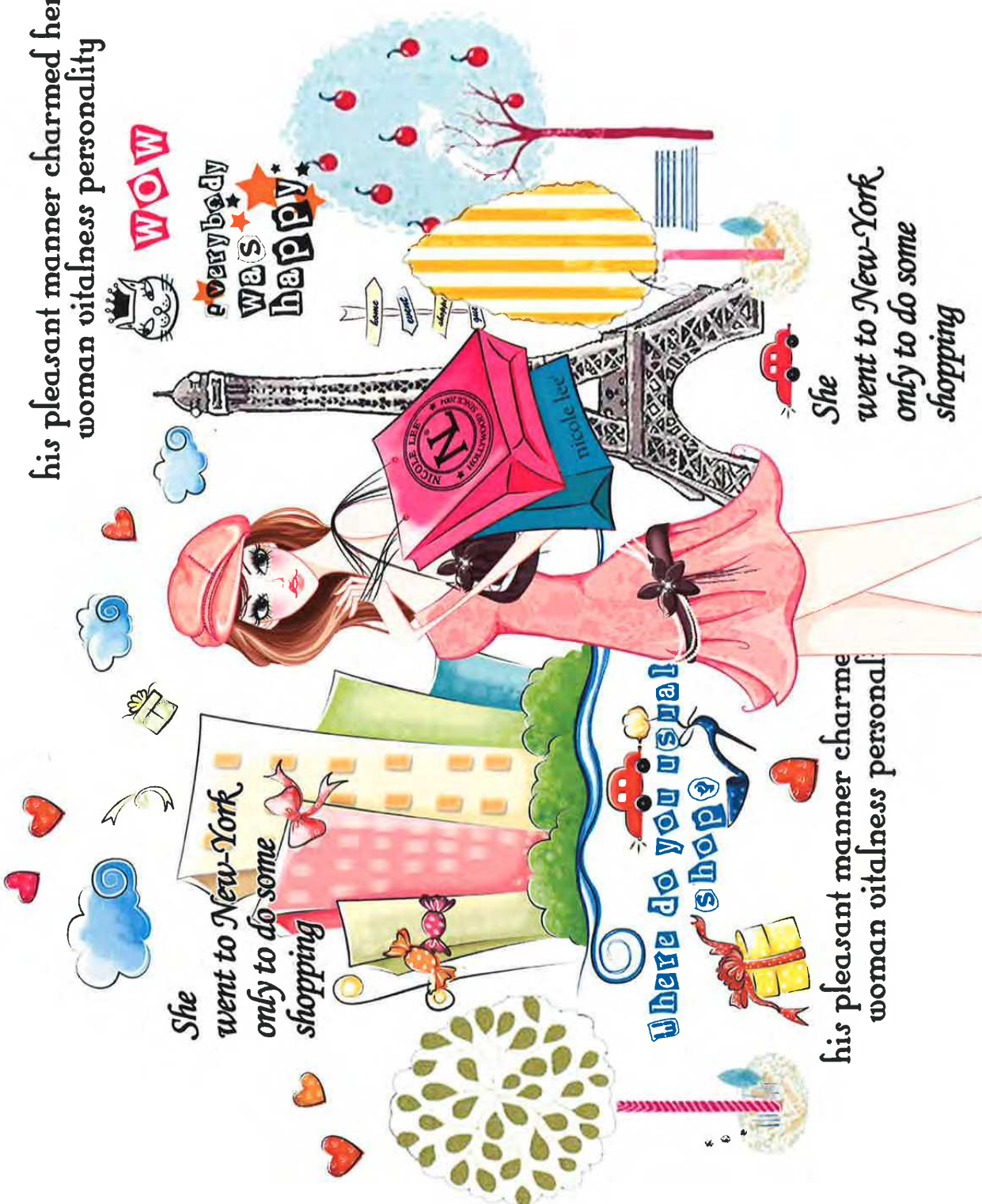
Address: 1133 South Boyle Avenue
Los Angeles, CA 90023 United States

Fax: 323-264-0009

Mail Certificate

Nicole Lee
1133 South Boyle Avenue
Los Angeles, CA 90023 United States

his pleasant manner charmed her woman vitafness personality



She went to New-York only to do some shopping

Where do you usual shop?

She went to New-York only to do some shopping

his pleasant manner charmed her woman vitafness personality

Certificate of Registration

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This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-879-233

Effective date of
registration:
September 30, 2013

Title _____

Title of Work: Leopard and butterfly background with model, surrounded by flowers in the center with leopard print cowboy hat for handbags, garments, and accessories.

Completion/Publication _____

Year of Completion: 2013
Date of 1st Publication: August 30, 2013 **Nation of 1st Publication:** United States

Author _____

▪ **Author:** NICOLE LEE
Author Created: 2-D artwork, applied to handbags and carry-on luggage
Work made for hire: Yes
Citizen of: United States **Domiciled in:** United States

Copyright claimant _____

Copyright Claimant: NICOLE LEE
1133 SOUTH BOYLE AVENUE, LOS ANGELES, CA, 90023, United States

Rights and Permissions _____

Organization Name: NICOLE LEE
Email: min.l@nicoleleeusa.com **Telephone:** 323-264-0005
Address: 1133 SOUTH BOYLE AVENUE
LOS ANGELES, CA 90023 United States

Certification _____

Name: MIN LEE
Date: September 30, 2013

Registration #: VA0001879233
Service Request #: 1-1001548678

0000VA00018792330101

NICOLE LEE
1133 SOUTH BOYLE AVENUE
LOS ANGELES, CA 90023 United States



EXHIBIT A

Certificate of Registration

RECEIVED NOV 08 2013



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-879-567

Effective date of
registration:

October 14, 2013

Title

Title of Work: Nicole Lee pyramid lock hardware for handbags, garments, and accessories.

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: October 1, 2013

Nation of 1st Publication: United States

Author

Author: NICOLE LEE

Author Created: Technical drawing

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: NICOLE LEE

1133 SOUTH BOYLE AVENUE, LOS ANGELES, CA, 90023, United States

Rights and Permissions

Organization Name: NICOLE LEE

Email: min.l@nicoleeusa.com

Telephone: 323-264-0005

Address: 1133 SOUTH BOYLE AVENUE

LOS ANGELES, CA 90023 United States

Certification

Name: MIN LEE

Date: October 14, 2013

Correspondence: Yes

Registration #: VA0001879567

Service Request #: 1-1006440861

0000VA00018795670101

NICOLE LEE
1133 SOUTH BOYLE AVENUE
LOS ANGELES, CA 90023 United States



NL PYRAMID LOCK

HARDWARE #1

[ACTUAL SIZE]

HARDWARE : LIGHT GOLD

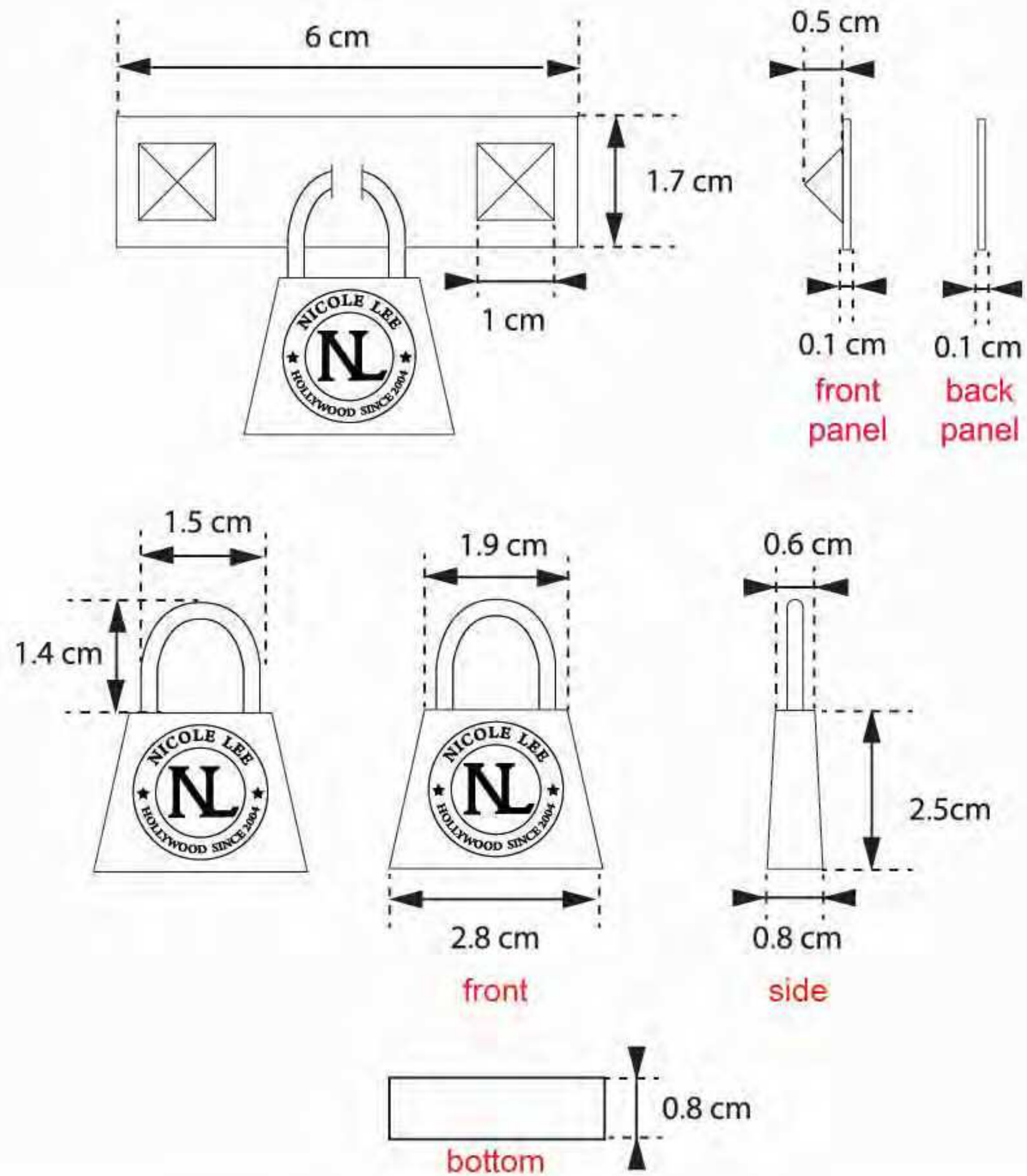




EXHIBIT A

Certificate of Registration

RECEIVED AUG 12 P.M.



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maui A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-870-054

Effective date of
registration:

July 3, 2013

Title

Title of Work: Lion portrait print with crown embellishment and square studs, with faux croc skin details for handbags, garments, and accessories.

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: May 15, 2013

Nation of 1st Publication: United States

Author

▪ **Author:** NICOLE LEE

Author Created: 2-D artwork, applied to handbags and carry-on luggage

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: NICOLE LEE

1133 SOUTH BOYLE AVENUE, LOS ANGELES, CA, 90023, United States

Rights and Permissions

Organization Name: NICOLE LEE

Email: min.l@nicoleleecusa.com

Telephone: 323-264-0005

Address: 1133 SOUTH BOYLE AVENUE

LOS ANGELES, CA 90023 United States

Certification

Name: MIN LEE

Date: July 3, 2013



EXHIBIT A

Certificate of Registration



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Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-870-131

Effective date of registration:

July 8, 2013

Title

Title of Work: Jewelry print design with lion in a frame with circular and square studs, and faux croc trim for handbags, garments, and accessories.

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: May 15, 2013

Nation of 1st Publication: United States

Author

▪ **Author:** NICOLE LEE

Author Created: 2-D artwork, applied to handbags and carry-on luggage

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: NICOLE LEE

1133 SOUTH BOYLE AVENUE, LOS ANGELES, CA, 90023, United States

Rights and Permissions

Organization Name: NICOLE LEE

Email: min.l@nicoleleeusa.com

Telephone: 323-264-0005

Address: 1133 SOUTH BOYLE AVENUE

LOS ANGELES, CA 90023 United States

Certification

Name: MIN LEE

Date: July 8, 2013



EXHIBIT A

-APPLICATION-

Title

Title of Work: NL logo stamp pattern with stars and stripes detail.
White background with NL logo stamp and details of NL character.
Diamond pattern background with NL logo and geometric symbols.
Four hound-tooth like geometric pattern with Nicole Lee logo.
Brown polka dots pattern with Nicole Lee written in cursive.
Nicole Lee U.S.A. logo pattern in red and cream color.
Cartoon images of flowers, clothing, and necklace, and NL logo with white background.
Nicole Lee in bold black and red front pattern background.
Red background with blue polka dots and Nicole Lee logo.
Geometric diamond print with NL logo in the center.
Color-block background with NL logo stamp.

Completion/Publication

Year of Completion: 2009
Date of 1st Publication: September 1, 2009 **Nation of 1st Publication:** United States

Author

▪ **Author:** NICOLE LEE
Author Created: 2-D artwork, applied to garments, handbags, travelware and accessories.
Work made for hire: Yes
Citizen of: United States **Domiciled in:** United States

Copyright claimant

Copyright Claimant: NICOLE LEE
1133 SOUTH BOYLE AVENUE, LOS ANGELES, CA, 90023, United States

Rights and Permissions

Organization Name: NICOLE LEE
Email: min.l@nicoleleeusa.com **Telephone:** 323-264-0005
Address: 1133 SOUTH BOYLE AVENUE
LOS ANGELES, CA 90023 United States

EXHIBIT A

Certification

Name: MIN LEE

Date: September 17, 2014

Registration #:

Service Request #: 1-1754078851

Priority: Routine

Application Date: September 17, 2014 04:10:10 PM

Note to C.O.: NICOLE LEE IS A COMPANY LOCATED IN LOS ANGELES, CALIFORNIA

Correspondent

Organization Name: NICOLE LEE

Name: MIN LEE

Email: min.l@nicoleleeusa.com

Telephone: 323-264-0005

Address: 1133 SOUTH BOYLE AVENUE
LOS ANGELES, CA 90023 United States

Fax: 323-264-0009

Mail Certificate

NICOLE LEE
1133 SOUTH BOYLE AVENUE
LOS ANGELES, CA 90023 United States

EXHIBIT A



nikole lee

lee

BLOOM

nikole lee

EXHIBIT A

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Exhibit B

(Images of Ourz's handbags from Complaint)



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Exhibit C
(The Ourz Inventory)

P83246 #033 BLACK	64 PCS (WALLET)
P83246 #033 MUTI	64 PCS (WALLET)
P83248 #033 BLACK	67PCS (CROSS-BODY)
P83248 #033 MUTI	72PCS (CROSS-BODY)
P83247 #033 BLACK	72PCS (SMALL MESSENGER)
P83247 #033 MUTI	72PCS (SMALL MESSENGER)
P83249 #033 BLACK	44PCS (TOTE HANDBAG)
P83249 #033 MUTI	44PCS (TOTE HANDBAG)
P83250 #033 BLACK	36PCS (HANDBAG)
P83250 #033 MUTI	38PCS (HANDBAG)